

DONALD M. FALK (SBN 150256)
JOHN M. NEUKOM (SBN 275887)
MAYER BROWN LLP
Two Palo Alto Square, Suite 300
3000 El Camino Real
Palo Alto, CA 94306-2112
Telephone: (650) 331-2000
Facsimile: (650) 331-2060
Email: dfalk@mayerbrown.com
jneukom@mayerbrown.com

Attorneys for Plaintiff AT&T MOBILITY LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AT&T MOBILITY LLC,
Plaintiff,

v.

LESLIE BERNARDI and LAURA BARRETT,
Defendants.

Case No. 3:11-cv-03992-CRB

**STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME
FOR DEFENDANTS TO RESPOND TO
COMPLAINT AND STAY OF FILING
OF SUBSTANTIVE MOTIONS**

Hon. Charles R. Breyer

1 WHEREAS, on August 12, 2011, Plaintiff AT&T Mobility LLC ("AT&T") commenced
2 this action by filing the Complaint;

3 WHEREAS, on August 19, 2011, Scott Bursor of Bursor & Fisher PA agreed to accept
4 service of process electronically on behalf of his clients, Defendants Leslie Bernardi and Laura
5 Barrett;

6 WHEREAS, the parties stipulate that the Defendants' obligation to respond to the
7 complaint shall be extended until September 9, 2011;

8 WHEREAS, to accommodate the schedules of counsel, the parties stipulate that no party
9 will file any substantive motion in this action, including any application under Federal Rule of
10 Civil Procedure 65, before September 9, 2011, unless arbitrators are appointed in any of the
11 arbitration proceedings referenced in the Complaint;

12 **THEREFORE, IT IS HEREBY STIPULATED** that Defendants' time to respond to
13 the Complaint shall be stayed until September 9, 2011, and no party shall file any substantive
14 motion in this action before September 9, 2011, unless arbitrators are appointed in any of the
15 arbitration proceedings referenced in the Complaint.

16 **AGREED TO BY:**

17 **BURSOR & FISHER P.A.**

18 By: /s/ Scott A. Bursor

19 Scott A. Bursor (application for
20 admission *pro hac vice* forthcoming)
21 Joseph I. Marchese (application for
admission *pro hac vice* forthcoming)

22 369 Lexington Avenue, 10th Floor
23 New York, NY 10017
24 Telephone: (212) 989-9113
Facsimile: (212) 989-9163
Email: scott@bursor.com
25 jmarchese@bursor.com

16 **MAYER BROWN LLP**

18 By: /s/ John M. Neukom

Donald M. Falk (SBN 150256)
John M. Neukom (SBN 275887)
Two Palo Alto Square, Suite 300
3000 El Camino Real
Palo Alto, California 94306-2112
Telephone: (650) 331-2000
Facsimile: (650) 331-2060
Email: dfalk@mayerbrown.com
jneukom@mayerbrown.com

1 L. Timothy Fisher
2 Sarah N. Westcot
3 BURSOR & FISHER, P.A.
4 2121 North California Blvd., Suite 1010
5 Walnut Creek, CA 94596
6 Telephone: (925) 482-1515
7 Facsimile: (925) 407-2700
8 E-Mail: ltfisher@bursor.com
9 swestcot@bursor.com

10 Barry L. Davis
11 Aaron P. Davis
12 THORNTON, DAVIS & FEIN, P.A.
13 80 SW Eighth Street, 29th Floor
14 Miami, FL 33130
15 Telephone: (305) 446-2646
16 Facsimile: (305) 441-2374
17 E-Mail: davis@tdflaw.com
18 adavis@tdflaw.com

19 Nadeem Faruqi
20 Antonio Vozzolo
21 Faruqi & Faruqi LLP
22 369 Lexington Ave., 10th Floor
23 New York, NY 10017
24 Telephone: (212) 983-9330
25 Facsimile: (212) 441-2374
26 E-Mail: nfaruqi@faruqilaw.com
27 avozzolo@faruqilaw.com

28 *Attorneys for Defendants Leslie Bernardi and
Laura Barrett*

Pursuant to General Order No. 45, Section X(B), I hereby attest that the above signatories
concur in the filing of this document.

Dated: September 8, 2011

/s/ John M. Neukom

John M. Neukom

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 9, 2011

Hon. Charles R.

